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Attorneys for Defendant
Navigators Specialty Insurance Company

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ASSOCIATED INDUSTRIES
INSURANCE COMPANY, INC.,

Plaintiff,

v.

NAVIGATORS SPECIALTY INSURANCE
COMPANY,

Defendant.

Case No. 2:23-cv-01252-RFB-VCF

**STIPULATION TO EXTEND TIME TO
RESPOND TO THE COMPLAINT
(FIRST REQUEST)**

Complaint Filed: August 11, 2023
Trial Date: None set

Pursuant to Local Civil Rule 6-1(a), Defendant NAVIGATORS SPECIALTY INSURANCE COMPANY (“Defendant”) and Plaintiff ASSOCIATED INDUSTRIES INSURANCE COMPANY, INC. (“Plaintiff”), by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, Plaintiff filed a Complaint on August 11, 2023;

WHEREAS, Plaintiff served its Complaint on Defendant on August 28, 2023;

WHEREAS, Defendant currently has until Monday, September 18, 2023, to answer or respond to Plaintiff’s Complaint;

WHEREAS, Defendant has requested and Plaintiff has consented to an additional 15 days for Defendant to file an answer or otherwise respond to the Complaint;

1 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties, through
2 their respective counsel, that Defendant shall answer or otherwise respond to Plaintiff's Complaint
3 on or before October 2, 2023.

4 This is the first stipulation filed by the parties for an extension of time to respond to
5 Plaintiff's Complaint.

6 IT IS SO STIPULATED.

7
8
9 Dated: September 15, 2023

MORALES FIERRO & REEVES

10 By: /s/ Ramiro Morales
11 Ramiro Morales
12 Kelly A. Hedberg
13 Attorneys for Plaintiff
Associated Industries Insurance
Company, Inc.

14
15
16 Dated: September 15, 2023

**McCLOSKEY, WARING, WAISMAN
& DRURY LLP**

17 By: /s/ Andrew R. McCloskey
18 Andrew R. McCloskey
19 Attorney for Defendant
Navigators Specialty Insurance
Company

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21 Dated: 9-15-2023

IT IS SO ORDERED:

22 
23 _____
24 Cam Ferenbach
25 United States Magistrate Judge
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 15th day of September, 2023, a true and correct copy of
**STIPULATION TO EXTEND TIME TO RESPOND TO THE COMPLAINT
(FIRST REQUEST)** was served electronically via the court's Odyssey CM/ECF system to all
parties on the CM/ECF Service Contact List in accordance with the mandatory electronic service
requirements of Administrative Order 14-2 and the Nevada Electronic Filing and Conversion
Rules.



Noemi Wright